

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,
Plaintiff,

vs.

CRAIG S. DONAIS, RUSSELL F.
HILLIARD, DONAIS LAW OFFICES
PLLC, UPTON AND HATFIELD LLP,
and MARY K. DONAIS,
Defendants.

Case No. 1:23-cv-374-JL-TSM

**DEFENDANTS RUSSELL F. HILLIARD’S AND UPTON & HATFIELD, LLP’S NOTICE
OF JOINDER TO CRAIG DONAIS, MARY DONAIS AND DONAIS LAW OFFICES
PLLC’S OBJECTION TO PLAINTIFF’S MOTION FOR DISCOVERY (Doc. no. 197)**

NOW COME Defendants Russell F. Hilliard (“Hilliard”) and Upton & Hatfield, LLP (“Upton & Hatfield”) (collectively “Defendants”) and hereby submit this Notice of Joinder to Craig Donais, Mary Donais and Donais Law Offices, PLLC’s Objection to Plaintiff’s Motion for Discovery (Doc. no. 202). In support of its Notice of Joinder, Defendants state as follows:

1. Defendants hereby join in and incorporate by reference the Donais Defendants’ Objection to Plaintiffs’ Motion for Discovery (Doc. no. 202), which demonstrate why discovery at this stage is not necessary.¹

WHEREFORE, Defendants Russell F. Hilliard and Upton & Hatfield, LLP respectfully request this Court deny Plaintiff’s Motion for Discovery (Doc. no. 197) and grant such other and further relief as is equitable and just.

¹ Hilliard and Upton & Hatfield note that Plaintiff’s Motion for Discovery appears to seek discovery on issues related solely to the Donais Defendants, but requests leave to serve written discovery on “defendants.” *See* Doc. no. 197 at ¶ 50.a.

Respectfully submitted,

The Defendants,
RUSSELL F. HILLIARD and
UPTON & HATFIELD, LLP,

By their attorneys,

Dated: May 23, 2024

/s/ Daniel R. Sonneborn

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of this document to be served via electronic filing on all counsel of record or pro se parties on May 23, 2024.

/s/ Daniel R. Sonneborn

Daniel R. Sonneborn